

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE E. SANTANA RAMOS  
Debtor

CASE NO. 17-07343 (MCF)  
CHAPTER 13

JOSE E. SANTANA RAMOS,  
Plaintiff,

**ADV. PROC. NO. 18-00064 (MCF)**

v.

SCOTIABANK OF PUERTO RICO,  
ALEJANDRO OLIVERAS RIVERA, ESQ.,  
CHAPTER 13 TRUSTEE,  
Defendants.

COMPLAINT TO DETERMINE  
VALIDITY OF LIEN,  
RULE 7001(2) FRBP

**SCOTIABANK DE PUERTO RICO'S MOTION FOR FURTHER EXTENSION OF TIME  
TO FILE ANSWER TO COMPLAINT AND/OR DISPOSITIVE MOTION**

**TO THE HONORABLE COURT:**

Comes now, Scotiabank de Puerto Rico ("Scotiabank"), named defendant, through the undersigned counsel, and very respectfully states and prays:

1. On May 29, 2018, José E. Santana Ramos (the "Plaintiff") filed the Complaint (the "Complaint") that initiated the above-captioned adversary proceeding (the "Adversary Proceeding") in bankruptcy case no. 17-07343 (MCF) (the "Bankruptcy Case") before this Court (the "Court"). [Docket

No. 1]. On May 30, 2018, summons was issued as to Scotiabank. [Docket No. 3].

2. The Plaintiff and Scotiabank, through counsel, have been conversing about the possibility of reaching a consensual resolution of the Adversary Proceeding.

3. In order to conclude such discussions, and thus, avoid any unnecessary litigation (and related costs), as well as to complete the necessary research and investigations regarding the allegations contained in the Complaint, Scotiabank respectfully requests an additional term of thirty (30) days to file an answer to the Complaint and/or a dispositive. The proposed extension of time will expire on August 29, 2018.

4. The request for additional term included herein is not intended to cause, nor should it result in, a delay in the proceedings, taking into consideration that the Court has set an initial scheduling conference for September 12, 2018. [Docket No. 7].

5. Furthermore, counsel for the Plaintiff has been informed of the contents of this motion, and has set forth that there is no objection to the relief requested herein.

6. Scotiabank reserves the right to present all affirmative defenses and/or allegations, and does not waive any defense with the request for extension of time contained herein.

WHEREFORE, Scotiabank respectfully requests that this Honorable Court grant the foregoing extension of time of thirty (30) days, to expire on August 29, 2018, for Scotiabank to file its answer to the Complaint and/or dispositive motion.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this same date the foregoing was electronically filed, utilizing the CM/ECF System, which, upon information and belief, will notify the same to all participants, including counsel for the Plaintiff.

In San Juan, Puerto Rico, on July 30, 2018.

**Fernández, Collins, Cuyar & Plá**

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